

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Jeffery Marshall and
Katrina A. Marshall,
Debtor(s).

Case No. 09-08860

Honorable Susan Pierson Sonderby

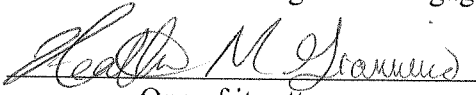
**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT
OF FINAL MORTGAGE CURE AMOUNT**

NOW COMES Regions Bank dba Regions Mortgage (hereinafter referred to as "Regions") by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount,, states as follows:

1. On or about January 12, 2009, Regions filed its Proof of Claim as Claim Number 20 for a sum of \$7,957.28 in pre-petition arrearage.
2. The Debtors' Chapter 13 plan filed on March 17, 2009 and confirmed on May 21, 2009 sets-forth a pre-petition arrearage amount owed to Centruie of \$3,000.00.
3. The Chapter 13 Trustee has disbursed a total of \$3,000.00 to Regions per the confirmed plan.
4. The total pre-petition arrearage owed to Regions per the filed Proof of Claim is \$7,957.28.
5. Therefore, the Debtors have failed to cure the total pre-petition default as set-forth in the Proof of Claim filed on behalf of Regions on January 12, 2010.

WHEREFORE, Regions Bank dba Regions Mortgage prays that the Court declare that the pre-petition arrearage payments are not current at this time.

REGIONS BANK dba Regions Mortgage,

By: 
One of its attorneys

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